

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	Chapter 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	Case No. 20-50805

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KrisJenn Ranch, LLC, KrisJenn Ranch,	§	
LLC–Series Uvalde Ranch, and KrisJenn	§	
Ranch, LLC–Series Pipeline ROW, as	§	
successors in interest to Black Duck	§	
Properties, LLC,	§	
	§	Adversary No. 20-05027
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
DMA Properties, Inc. and Longbranch	§	
Energy, LP,	§	

*Defendants.*

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DMA Properties, Inc. and Frank Daniel	§	
Moore,	§	
	§	
<i>Cross-Plaintiffs/Third-Party Plaintiffs,</i>	§	
	§	
v.	§	Adversary No. 20-05027
	§	
KrisJenn Ranch, LLC, KrisJenn Ranch,	§	
LLC–Series Uvalde Ranch, and KrisJenn	§	
Ranch, LLC–Series Pipeline ROW, Black	§	
Duck Properties, LLC, Larry Wright, and	§	
John Terrill,	§	

*Cross-Defendants/Third-Party Defendants.*

**DMA PROPERTIES, INC.’S WITNESS & EXHIBIT LIST FOR HEARING ON SEPTEMBER 22, 2020**

NOW COMES DMA Properties, Inc. (“Movant”), and submits this Witness and Exhibit List for the Hearing to be conducted on Tuesday September 22, 2020 at 10:00 A.M. before the Honorable Craig A. Gargotta.

### **WITNESSES**

1. Movant does not anticipate any live witnesses, but reserves the right to call any witnesses designated by any other party, as well as call witnesses as required to rebut the testimony of any witness.

### **EXHIBITS**

<b>EX. NO.</b>	<b>DESCRIPTION</b>	<b>M A R K E D</b>	<b>O F F E R E D</b>	<b>O B J E C T</b>	<b>A D M I T</b>	<b>D A T E</b>	<b>ACTION TAKEN</b>
1.	Declaration of Frank Daniel Moore						
2.	Declaration of Darin Borders						
3.	December 2, 2015 Email Chain						
4.	February 19, 2016 Email Chain						
5.	March 10, 2016 Email Chain						
6.	Black Duck Company Agreement						
7.	Purchase Agreement						
8.	Longbranch Assignment						
9.	February 21, 2017 Email 1						
10.	February 21, 2017 Email 2						
11.	July 13, 2017 Email						
12.	Extension of Closing Date						
13.	July 17, 2017 Email Chain 1						
14.	July 17, 2017 Email Chain 2						
15.	Black Duck Deed						
16.	KrisJenn Ranch Deed of Trust						

17.	Loan Documents						
18.	February 4, 2018 Email Chain						
19.	February 7, 2018 Email Chain						
20.	DMA Agreement						
21.	Letter of Intent						
22.	Terrill Affidavit						
23.	TCRG LLC Agreement						
24.	TCRG Purchase Agreement						
25.	TCRG Deed						
26.	April 9, 2018 Email Chain 1						
27.	April 9, 2018 Email Chain 2						
28.	April 9, 2018 Email Chain 3						
29.	April 10, 2018 Email Chain						
30.	April 11, 2018 Email Chain						
31.	April 16, 2019 Email						
32.	Release of Lien						
33.	Option Agreement						
34.	Excerpt of May 21, 2020 Hearing Transcript						

1. Movant reserves the right to introduce any exhibit designated by any other party in interest.

2. Movant further reserves the right to supplement and/or amend this list or introduce any evidence necessary for rebuttal.

Date: September 15, 2020

Respectfully submitted,

/s/ Natalie F. Wilson

**LANGLEY & BANACK, INCORPORATED**

745 E. Mulberry, Suite 700  
San Antonio, Texas 78212  
(210) 736-6600 Telephone  
(210) 735-6889 Telecopier  
Email: [nwilson@langleybanack.com](mailto:nwilson@langleybanack.com)

COUNSEL TO DMA PROPERTIES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2020, a true and correct copy of the above and foregoing instrument was served via the Court's electronic transmission facilities on those parties registered for such notice and served via first class mail, postage prepaid on the parties below.

<p>Charles John Muller, IV  Email: john@muller-smeberg.com  Muller Smeberg, PLLC  111 W. Sunset  San Antonio, TX 78209</p> <p>Ronald J. Smeberg  Email: ron@smeberg.com  The Smeberg Law Firm, PLLC  2010 W Kings Hwy  San Antonio, TX 78201-4926</p> <p><b>Counsel to Plaintiffs Krisjenn Ranch, LLC,  Krisjenn Ranch, LLC, Series Uvalde Ranch,  Krisjenn Ranch, LLC, Series Pipeline Row</b></p>	<p>Michael Black  Email: mblack@burnsandblack.com  BURNS &amp; BLACK PLLC  750 Rittiman Road  San Antonio, TX 78209</p> <p>Jeffery Duke  Email: jduke@dbmmlaw.com  DUKE BANISTER MILLER &amp; MILLER  22310 Grand Corner Drive, Suite 110  Katy, TX 77494</p> <p><b>Counsel to Defendant Longbranch Energy,  LP</b></p>
<p>Ronald J. Smeberg  Email: ron@smeberg.com  The Smeberg Law Firm, PLLC  2010 W Kings Hwy  San Antonio, TX 78201-4926</p> <p><b>Counsel to Third-Party Defendant Black  Duck Properties, LLC</b></p>	<p>Shane P. Tobin  Email: shane.p.tobin@usdoj.gov  OFFICE OF THE U.S. TRUSTEE  903 San Jacinto Blvd, Room 230  Austin, Texas 78701</p> <p><b>United States Trustee</b></p>
<p>William P. Germany  Email: wgermany@bsklaw.com  BAYNE, SNELL &amp; KRAUSE  1250 N.E. Loop 410, Suite 725  San Antonio, Texas 78209</p> <p><b>COUNSEL FOR Third Party Defendant  Larry Wright</b></p>	<p>John Terrill  12712 Arrowhead Lane  Oklahoma City, OK 73120</p> <p><b>Third Party Defendant, <i>pro se</i></b></p>

/s/ Natalie F. Wilson  
NATALIE F. WILSON